



# JACKSON COUNTY

Oregon

## Board of Commissioners

Rick Dyer (541) 774-6118  
Randy Sparacino (541) 774-6119  
Colleen Roberts (541) 774-6117  
Fax: (541) 774-6705

10 South Oakdale, Room 214  
Medford, Oregon 97501  
BoC-CAO\_Admin@jacksoncountyor.gov

March 13, 2025

United States Department of Agriculture, Forest Service  
Regional Office 6 - Pacific Northwest Region  
PO Box 3623  
Portland OR 97208

RE: Comments Regarding the Proposed Northwest Forest Plan Amendment No. 64745

Dear United States Department of Agriculture, Forest Service:

We, the Jackson County Board of Commissioners, thank you for the opportunity to comment on Northwest Forest Plan (NWFP) Amendment No. 64745. We understand that one purpose of the proposed Amendment is to address the ongoing crises of high-severity wildfires and substantial loss of mature and old-growth forests within the NWFP area. Jackson County strongly believes that the United States Department of Agriculture, Forest Service (USFS), as well as all Federal agencies responsible for managing Federal lands in our community, are obligated to manage those lands responsibly and responsively to ensure that they do not adversely affect our communities, including issues such as wildfires, smoke from wildfires, and lost economic opportunities. Our community and economy are dependent on responsible, efficient, and safe management of these Federal lands.

Upon reviewing the NWFP Amendment Draft Environmental Impact Statement (DEIS) released in November 2024, we are concerned that many of the components in the proposed Amendment will not be effective under any of the four alternatives. As written, the DEIS does not address the Survey and Manage standards, which are outdated and significantly limit the meaningful changes that are necessary to address the biggest modern threats to our forestlands. Therefore, on behalf of our residents, business owners, and the visitors who enjoy our natural resources, we offer the following comments related to the proposed Amendment.

**In order for this Amendment to effectively mitigate fire risks in our forests, USFS must remove the Survey and Manage standards.**

The Survey and Manage standards were established over 20 years ago to protect over 300 species believed to be dependent on mature and old-growth forests, known as Late-Successional Reserves (LSRs). However, in the years following the implementation of the Survey and Manage standards, the nature of LSRs evolved, and modern research indicates that the Survey and Manage standards are now obsolete. Adhering to these outdated standards results in vast areas being restricted from active management of dry, fire-prone forests. These fire risks, along with the inability to mitigate such risks through active forest management, are harmful to the very species that were intended to be protected. Therefore, USFS must remove the Survey and Manage standards and guidelines throughout the proposed NWFP Amendment.

**The NWFP Amendment must identify timber production as the primary focus on young, moist forest stands.**

The NWFP, adopted in 1994, limited the land base suitable for timber production to less than 15 percent of the Plan's footprint. This 15 percent constitutes what is referred to as the matrix land use allocation (matrix lands). It has been well-documented that the timber levels set for the matrix lands were never attained, which had a

significant impact on the economy in Jackson County and on the general health of the forests within the NWFP area.

As written, the proposed NWFP Amendment will effectively reduce the matrix land base even further. Although the Amendment does not change the base-level matrix lands, it does propose new conditions, standards, and guidelines that would transition over 1,300,000 acres of young, moist mature matrix lands into quasi-LSRs mature and old-growth forests. This represents over half of the existing moist matrix lands. Such a transition would mean that mature, moist forestlands currently available for harvesting would no longer be available to harvest, thin, or manage.

The proposed Amendment language, without a necessary revision, will limit sustained-yield timber management to approximately 5 percent of the NWFP footprint area. This change is a function of the proposed modifications to dry forest management and the stated goal of prioritizing the misguided desired conditions of 1,300,000 acres of mature, moist forests in the matrix lands.

In order to mitigate this significant change, the Amendment must include language to explicitly identify timber production as the primary focus on forest stands designated or identified as young moist lands within the Matrix. We strongly urge that USFS revise the Amendment and incorporate opportunities to transition young forest stands in the moist LSRs system into the matrix lands classification.

**The proposed desired condition to prioritize large, old trees while promoting the absence of small, young trees will decimate the supply of future timber products.**

The clear, explicit intent of the NWFP Amendment is to expand active forest management and timber harvest on all forest stands identified as dry forest across all land use allocations. However, as stated, the proposed desired condition to promote the existence of large, old trees and the absence of small, young trees will likely inhibit sustainable timber production eventually on these lands.

Based on a review of the DEIS, our understanding is that the directive on all dry forests following the initial timber harvest is guided by the concept of forest maintenance, where periodic controlled burns will be applied to destroy the small, young trees that fuel large-scale wildfires. We understand that this approach can reduce hazardous fuels but it will ultimately decimate the sustainable growth of forest stands that supply timber products.

Additionally, this approach will prioritize mature and old-growth forest stands that currently exist but will not promote long-term forest resilience. Active, focused, and targeted forest management of small, young trees alongside old-growth trees will reduce fuel loads and contribute to LSRs resilience.

**The Amendment must include clear standards to ensure that the young, moist matrix lands is managed based on principles of sustained-yield timber management.**

Since the inception of the NWFP, the primary forest management paradigm regarding the timber program has been dominated by intermediate thinning treatments. This paradigm is unsustainable, particularly in Douglas-fir-dominated forests. The management of such forests requires regeneration harvest to sustain optimal forest health. Under the current practice and proposed Amendment language, USFS will run out of suitable acres to thin, which ultimately harms the health of the forest. The NWFP Amendment must include directives to ensure that regeneration harvest occurs on the diminished matrix lands.

**The existing tree-height buffer on riparian reserves is excessive and not rooted in current best practice.**

With this opportunity to amend the current language of the NWFP, we urge USFS to revise the existing buffer on riparian reserves and bring the language into conformance with modern science. The current language of the

NWFP requires removing the second site potential tree height buffer on riparian reserves for fish-bearing streams. In certain parts of the region, these buffers exceed 400 feet on each side of the stream, with over 800 feet of buffer zones in forest areas surrounding such streams. This is an excessive level of protection that is not aligned with modern science.

When the NWFP was developed, this second site's potential tree height was deemed necessary to protect the microclimate in the reserves. Research since then has indicated that these microclimate changes rarely extend beyond a single tree height. In 2016, the Bureau of Land Management (BLM) revised its Resource Management Plans that guide forest management on forestlands in western Oregon, many of which are adjacent to or intermingled with National Marine Fisheries Service (NMFS) lands governed by the NWFP. Through consultation with the NMFS, BLM determined that the second site's potential tree height was not warranted for appropriate protection of fish-bearing streams and adopted single-tree-height buffers adjacent to all streams. In the Amendment, the USFS should adjust the language to align with BLM, NMFS, and the best available science.

**The Amendment should provide clear direction for Adaptive Management Areas.**

The DEIS does not provide clear guidance or specifications on how Adaptive Management Areas (AMAs) should be managed. AMAs were introduced to test new techniques for active forest management, but this intent has not been fully realized under the NWFP. The Amendment should transition the AMAs to matrix lands, where their primary forest management objective would be timber production. This is another opportunity to partially offset the loss of matrix lands that will be managed as quasi-LSRs and not made available for timber production under the Amendment. Additionally, this would allow the USFS to test and introduce new techniques for timber production and forest management, as originally intended.

**Timber salvage is an essential part of reestablishing forest health after wildfire, and the Amendment should acknowledge this critical practice.**

The proposed Amendment prohibits any form of timber salvage in LSRs after natural disasters, including situations that occur post-wildfire. Salvage is a crucial method for accelerating late-successional forest characteristics after the devastation of forest stands due to wildfires. It is also a critical tool for climate change mitigation, as dead trees can no longer sequester carbon dioxide (CO<sub>2</sub>). The storage of CO<sub>2</sub> in long-lasting wood products, coupled with proactive reforestation in areas affected by fire, is the most effective way to utilize these forests for climate change mitigation following natural disasters.

Conversely, the proposed Amendment also fails to include language requiring salvage harvest on matrix lands. We urge USFS to mandate salvage harvest across matrix lands following natural disasters. Establishing new standards and guidelines that direct that salvage on matrix lands is a priority would be beneficial in attaining appropriate forest management following natural disasters and would promote the health of the forest and the climate.

**Allowing forest management of unplanned ignitions is irresponsible and poses a direct threat to Jackson County residents and visitors.**

Utilizing prescribed fires outside of the declared fire season is an effective tool for managing hazardous fuels. However, the practice of managing prescribed wildfires during the fire season is reckless. The proposed Amendment includes new objectives that explicitly identify the use of unplanned ignitions to attain desired forest conditions across the landscape. We strongly oppose any objectives of forest management that involve prescribed fires during the State declared fire season. As has been demonstrated repeatedly, attempting to control a wildfire rarely is successful and results in an out-of-control wildfire with devastating consequences on both the forests and our communities. As such, this directive is extremely concerning, particularly to Jackson

County residents, who live and work in communities adjacent to hundreds of thousands of acres of Federal forestlands. USFS should explicitly adopt a policy to aggressively suppress all wildfires, regardless of land use allocations, during the State declared wildfire season to protect the climate, public health, safety, and our communities.

**The proposed Amendment language lowers the monetary value of timber, which is an essential element of the economic health of our community.**

A predictable and robust supply of timber products is essential to Jackson County's economy, both in the private sector and in the financial health of our County's government. Funding from timber products is not just a function of how much timber is sold but is also based on the value of that timber. The DEIS provides a comparison of treatment acres and timber volume between the status quo and the proposed Amendment. The current treatment area is 212,000 acres, with 4.446 MMBF sold, for a value of 21.000 MBF/acre. The proposed Amendment language, as calculated in the DEIS, accounts for 735,000 acres treated and 9.700 MMBF sold, for a value of 13.000 MBF/acre, respectively. So, although the treatment area within the Amendment shows an increase of 247 percent, the volume sold only increases by 118 percent. In turn, the value per acre is significantly less under the proposed Amendment language, which will have a marked impact on County services. We urge USFS to revisit these calculations and the assumptions behind its results.

Furthermore, in light of the recent Executive Order issued by President Trump, entitled the Immediate Expansion of American Timber, we believe that USFS should revise all proposed alternatives considered in the DEIS to reflect and comply with the mandates of the President's Order. However, in conclusion, it is refreshing to see the Amendment proposing elevated levels of active management of dry forests. These fire-prone forests, regardless of their age or origin, must be available to manage to mitigate fire risk. However, simply including new objectives that guide such forest management is insufficient. Any real progress on such management is incumbent on removing the obstacles to effectively managing hazardous fuels in these dry forests. Those obstacles include the Survey and Manage standards, excessive riparian reserves, and arbitrary age limitations.

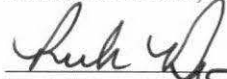
We urge USFS to consider the real economic effects of the proposed Amendment on local governments and rural communities. Our government's and our citizens' livelihoods depend on smart, effective, and responsible management of our natural resources.

Sincerely,

JACKSON COUNTY BOARD OF COMMISSIONERS



Colleen Roberts, Chair



Rick Dyer, Commissioner

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Randy Sparacino, Commissioner

jb/mc

By: Electronic Submission through the USFS Public Comment Portal

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